

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JANELLE GEDMIN,

Plaintiff,

v.

NORTH AMERICAN SAFETY
PRODUCTS, INC.,

Defendant.

Case No. 08 C 337

Judge St. Eve

Magistrate Judge Mason

JURY TRIAL DEMANDED

Joint Status Report

Plaintiff, Janelle Gedmin, by and through her attorneys, Karen J. Doran and Deanne S. Medina of DoranMedina, LLC, and Defendant, North American Safety Products, Inc., by and through its attorney Thomas Polacek of McNamara, Phelan, McSteen, LLC, inform the Court of the following:

1. **The Nature of the Case**

A. The attorneys of record for the parties are as follows:

Plaintiff: Karen J. Doran (lead trial attorney) and Deanne S. Medina of DoranMedina, LLC

Defendant: Thomas Polacek (lead trial attorney) of McNamara, Phelan, McSteen, LLC

B. The basis of federal jurisdiction is 28 U.S.C. § 1331.

C. Plaintiff claims that she was sexually harassed as an employee of Defendant.

D. The major factual and legal issues are whether the President and General Manager, Martin Mobek, sexually harassed Plaintiff throughout 2005 until her employment terminated on February 27, 2006, or whether she welcomed the behavior. Moreover, another major issue is whether her employment separation was a voluntary resignation or constructive discharge.

E. Plaintiff is seeking the following relief:

1. Back pay to include salary and benefits;
2. Compensation for emotional distress and other consequential damages in an amount to be determined by a jury;
3. Front pay to include salary and benefits for a period of time until it can be reasonably determined that she will earn comparable compensation;
4. Interest; and
4. Punitive damages in an amount to be determined by a jury.

2. **Pending Motions and Case Plan**

A. No pending motions

B. Proposed discovery plan:

- A. Limited written discovery and depositions will be needed;
- B. Rule 26(a)(1) disclosures by March 18, 2008;
- C. Fact discovery completed by June 30, 2008
- D. Expert discovery completed by July 28, 2008 with expert reports due by August 25, 2008;
- E. Dispositive motions due July 28, 2008; and
- F. Final pretrial order filed by September 22, 2008.

C. Trial:

- A. Jury trial;
- B. 2-3 day trial; and
- C. Case will be ready for trial October 13, 2008

3. At this time, the parties do not consent to trial before a magistrate judge.

4. **Status of Settlement Discussions**

- A. Settlement discussions have occurred;
- B. Settlement discussions are currently pending; and
- C. Parties do not request a settlement conference at this time.

Respectfully submitted,

/s/ Karen J. Doran

One of the Attorneys for Plaintiff

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/s/ Thomas Polacek

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